

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

United States Court
Southern District of Texas
FILED

MAR 28 2018

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

V.

YASSER SALEH OUWAD,

a/k/a Jesse

a/k/a Santino

LUIS GARCIA-OYUELA,

JOLMAN GARCIA-SOTO,

FABRICIO ALEXANDER JUAREZ,

MARCO HERNANDEZ-MALDONADO, §

a/k/a Hernan Demetrio

Hernandez-Gomez

a/k/a Hernan Hernandez,

Defendants.

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CRIMINAL NO.

18 CR 171

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

**(CONSPIRACY TO TRANSPORT STOLEN MERCHANDISE IN INTERSTATE
COMMERCE, 18 U.S.C. § 371)**

A. INTRODUCTION

1. YASSER SALEH OUWAD is the Director, Organizer and Registered Agent of GPS Wholesale, Inc., with a registered address in Houston, Texas. OUWAD is also a “fence” in the Houston area that receives stolen merchandise from “boosters.”

2. A “booster” is an individual that travels the United States stealing specific over-the-counter (OTC) merchandise from retail stores. A “booster often re-sells the stolen merchandise to a “fence”.

3. A “fence” is a person who buys the stolen goods and merchandise from “boosters” at a fraction of their retail value in order to re-sell the stolen goods for profit. The “fence” re-sells the stolen goods and merchandise to third parties.

4. “OTC merchandise” is medicine that does not require a prescription and also includes non-prescription personal hygiene products that can be readily sold in a secondary market. OTC includes but is not limited to Nexium, Mucinex, Claritin medications, diabetic testing supplies, shaving razors and toothbrush heads.

5. OUWAD operated GPS Wholesale from 12440 Oxford Park Drive, #B102, Houston, Texas 77082. OUWAD used #B102 to sort, store, clean, and prepare stolen OTC merchandise for shipment.

6. OUWAD has rented Unit #E204 at Life Storage, 12455 Westpark Drive, Houston, Texas 77082, since January 23, 2017. OUWAD used unit #E204 to store stolen OTC merchandise.

7. GPS WHOLESALE has rented Unit #C5 at Life Storage, 12711 Westheimer Road, Houston, Texas 77077, since October 1, 2016. OUWAD used Unit #C5 to store stolen OTC merchandise. OUWAD and GARCIA-OYUELA regularly picked packages up from this location.

8. OUWAD used The Mail Room, located at 10878 Westheimer Rd., Houston, Texas 77042 to receive stolen OTC from out of state. OUWAD rented Box #313 at the Mail Room since October 2015 and later transferred to Box #108 at the same location. The packages shipped to these mailboxes would be addressed to Santino Wholesale (or some variation thereof).

9. JOLMAN GARCIA-SOTO was born in Honduras and is in the United States illegally. GARCIA is a “booster crew leader” in OUWAD’S criminal organization.

10. LUIS GARCIA-OYUELA is a citizen of Honduras and is in the United States illegally. GARCIA-OYUELA worked for OUWAD at 12440 Oxford Park Drive, #B102,

Houston, Texas 77082, where he assisted OUWAD with receiving, sorting, cleaning, storing, and shipping stolen OTC merchandise.

11. FABRICIO ALEXANDER JUAREZ is a citizen of Honduras and is in the United States illegally. JUAREZ is a “booster crew leader” in OUWAD’s criminal organization.

12. JUAREZ rented Box #123 at Postal & Packages USA, located at 12520 Westheimer Road A-1, Houston, Texas 77077 to receive stolen OTC, on behalf of OUWAD, from out of state. The packages shipped to this mailbox would be addressed to Santino Wholesale (or some variation thereof).

13. MARCO HERNANDEZ-MALDONADO is a citizen of Honduras and is in the United States illegally. HERNANDEZ-MALDONADO is a “booster crew leader” in OUWAD’s criminal organization.

B. THE CONSPIRACY AND ITS OBJECTS

Beginning in or about June 2015, the exact date of which is unknown to the Grand Jury, through March 5, 2018, in the Houston Division of the Southern District of Texas and elsewhere, the Defendants,

**YASSER SALEH OUWAD,
LUIS GARCIA-OYUELA,
JOLMAN GARCIA-SOTO,
FABRICIO ALEXANDER JUAREZ,
MARCO HERNANDEZ-MALDONADO,**

did knowingly, combine, conspire, confederate and agree, with each other and with others known and unknown to the Grand Jury to commit the following offenses against the United States, that is:

(a) to transport and cause to be transported in interstate commerce stolen goods, wares, and merchandise having a value of \$5,000 or more, knowing and believing that the goods, wares, and merchandise had been stolen, in violation of Title 18, United States Code, Sections 2314 and 21; and

(b) receive, possess, conceal, store, sell and dispose goods, wares and merchandise, having a value of \$5,000 or more, which had crossed a State or United States boundary after being stolen, unlawfully converted or taken, knowing the same to have been stolen, unlawfully converted or taken, in violation of Title 18, United States Code, Sections 2315 and 21.

C. MANNER AND MEANS

The manner and means by which the conspiracy, of which the defendants were members, was sought to be accomplished included, among others, the following:

Acquisition of Stolen Merchandise by Boosters and Fences

14. It was part of the plan and purpose of the conspiracy that one or more of the conspirators/boosters would travel to pharmacies and retail stores both in Texas and in other states for the purpose of stealing over-the-counter (OTC) medicine and hygiene products.

15. It was part of the plan and purpose of the conspiracy that boosters would be advanced money by the fence to cover expenses incurred while traveling to steal OTC medicine and hygiene products from retailers.

16. It was part of the plan and purpose of the conspiracy that conspirators would use aluminum foil lined bags or purses to prevent detection of the stolen OTC merchandise by loss prevention devices when they left the store.

17. It was part of the plan and purpose of the conspiracy that the fence would wire money to boosters while they were out of state to cover any additional travel expenses or allow them to extend their trips to continue stealing OTC.

18. It was part of the plan and purpose of the conspiracy that boosters would place the stolen OTC in a box for shipping, along with an inventory list of the box's contents.

19. It was part of the plan and purpose of the conspiracy that boosters, at the fence's direction, would ship stolen OTC merchandise, across state lines, back to Houston, Texas, often using aliases as the shipper and addressee.

20. It was part of the plan and purpose of the conspiracy that the fence would pay the boosters for the stolen OTC.

Sale, Transfer, and Transportation of Stolen Merchandise from Fence to Wholesaler

21. It was a further part of the plan and purpose of the conspiracy that at the fence's direction, and with his assistance, conspirators would remove the retailer security stickers, prices and tags from the stolen merchandise to conceal the fact that these products had been stolen.

22. It was a further part of the plan and purpose of the conspiracy that the fence would sell the "cleaned" stolen OTC to out-of-state wholesalers.

23. It was a further part of the plan and purpose of the conspiracy that the fence would utilize interstate commercial shipping companies to deliver stolen OTC to the out-of-state wholesalers.

Payment for the Stolen Merchandise

24. It was a further part of the plan and purpose of the conspiracy that out-of-state wholesalers and purchasers of the stolen OTC would wire transfer funds into accounts controlled by the fence.

D. OVERT ACTS

In furtherance of the conspiracy described herein, one or more of the co-conspirators committed, in the Southern District of Texas and elsewhere, one or more of the following overt acts:

25. On or about June 5, 2015, three un-indicted co-conspirators were detained in St. Peters, Missouri with packing tape, inventory lists of stolen items, and a booster bag, i.e. a bag insulated with aluminum foil to circumvent store loss prevention sensors.

26. On or about June 17, 2015, GARCIA-SOTO arrived with two un-indicted female conspirators and one male conspirator at Hertz Rent-A-Car, located at 12970 Westheimer Rd., Houston, Texas to rent a vehicle.

27. On or about June 18, 2015, surveillance images at CVS, located at 4201 E. Park Avenue, Plano, Texas showed GARCIA-SOTO and a female stealing OTC merchandise.

28. On or about October 6, 2015, GARCIA-SOTO traveled to the Deluxe Inn Motel in Houston, Texas in order to pay a \$3,500 smuggling fee to undercover agents for a Confidential Source (CS), who, as a ruse, acted as if he/she had just been smuggled from Mexico to Houston, Texas.

29. On or about October 6, 2015, OUWAD arranged for the payment of the smuggling fee by GARCIA-SOTO.

30. On or about October 8, 2015, OUWAD met with the CS in Houston, Texas to pay the CS \$2000. OUWAD instructed that \$1,500 of that payment was to be used to repay GARCIA-SOTO for the smuggling fee and \$500 for travel expenses for GARCIA-SOTO.

31. On or about October 9, 2015, OUWAD abandoned bags in a gold Volkswagen Passat returned to Hertz Rent-A-Car, located at 12970 Westheimer Rd., Houston, Texas. Ronsol lighter fluid, cotton pads, rubber gloves, and numerous CVS and Walgreens stickers were found in the bags, consistent with cleaning stolen OTC.

32. On or about October 22, 2015, OUWAD met the CS in Houston, Texas to pay the CS \$1,000 for travel expenses.

33. On or about October 22, 2015, OUWAD provided the CS a list of OTC merchandise that he wanted the CS to steal.

34. On or about October 22, 2015, OUWAD instructed the CS to ship the OTC via Federal Express or UPS and to send OUWAD a text message containing the tracking number after shipment.

35. On or about October 30, 2015, OUWAD instructed the CS to send the shipment of OTC that OUWAD believed to be stolen to Santino Wholesale, 10878 Westheimer Rd., Box 313, Houston, Texas.

36. On or about October 30, 2015, under the direction and control of federal law enforcement agents, a controlled shipment of one box of purportedly stolen OTC, valued at approximately \$24,107, was sent from a FedEx store in Baton Rouge, Louisiana. Anti-theft stickers were placed on the OTC, and an inventory list was placed in the box before shipment.

37. On or about October 30, 2015, the CS shipped the purportedly stolen OTC to the address provided by OUWAD.

38. On or about October 30, 2015, the CS texted OUWAD the tracking number, and OUWAD acknowledged receipt of the tracking number.

39. On or about November 3, 2015, OUWAD met the CS in Houston, Texas to pay the CS \$5,900 for the shipment of purportedly stolen OTC products, shipped on October 30, 2015 from Baton Rouge, Louisiana. OUWAD withheld \$1,900 of the \$5,900 payment for repayment for the smuggling fee and because some of the purportedly stolen OTC was short-dated, i.e. close to its expiration date.

40. On or about November 18, 2015, OUWAD, or someone acting on behalf of OUWAD, wired the CS \$600 for additional expenses while OUWAD believed the CS was traveling out of state to steal OTC. The wire was sent from "Santino Garcia."

41. On or about November 20, 2015, GARCIA-SOTO instructed the CS to send the shipment of OTC that was believed to be stolen to Santino Wholesale, 10878 Westheimer Rd., Box 313, Houston, Texas and instructed the CS to send a photo of the tracking number.

42. On or about November 20, 2015, under the direction and control of federal law enforcement agents, a controlled shipment of one box of purportedly stolen OTC, valued at approximately \$30,154, was sent from a FedEx store in Metairie, Louisiana. Anti-theft stickers were placed on the OTC, and an inventory list was placed in the box before shipment.

43. On or about November 20, 2015, the shipment of purportedly stolen OTC was sent to the address provided by GARCIA-SOTO.

44. On or about November 20, 2015, the CS texted OUWAD the tracking number, and OUWAD acknowledged receipt of the tracking number.

45. On or about November 24, 2015, OUWAD met the CS in Houston, Texas to pay the CS \$3,500 for the shipment of purportedly stolen OTC products, shipped on November 20, 2015 from Metairie, Louisiana.

46. On or about December 2, 2015, OUWAD met the CS in Houston, Texas to pay the CS \$800 for travel expenses.

47. On or about December 16, 2015, OUWAD, or someone acting on his behalf, wired the CS \$800 from Western Union for additional expenses while OUWAD believed the CS was traveling out of state to steal OTC. The wire was sent from "Holmen Garcia."

48. On or about December 17, 2015, GARCIA-SOTO instructed the CS to send the shipment of OTC that was believed to be stolen to Santino Wholesale, 1510 Eldridge Parkway, #110, Houston, Texas.

49. On or about December 17, 2015, under the direction and control of federal law enforcement agents, a controlled shipment of one box of purportedly stolen OTC, valued at approximately \$36,911, was sent from a FedEx store in Hollywood, Florida. Anti-theft stickers were placed on the OTC, and an inventory list was placed in the box before shipment.

50. On or about December 17, 2015, the shipment of purportedly stolen OTC was sent to the address provided by GARCIA-SOTO.

51. On or about December 17, 2015, the CS texted OUWAD the tracking number, and OUWAD acknowledged receipt of the tracking number.

52. On or about December 22, 2015, OUWAD met the CS in Houston, Texas to pay the CS \$4,900 for the shipment of purportedly stolen OTC, shipped on December 17, 2015 from Hollywood, Florida.

53. On or about December 23, 2015, OUWAD met the CS in Houston, Texas to pay the CS \$1,600 for travel expenses.

54. On or about December 30, 2015, OUWAD exited storage unit #B102 at 12440 Oxford Park, Houston, Texas and dropped a black garbage bag in a dumpster located in a common area parking lot. Upon retrieving the bag, agents found that it contained Abreva packaging, inventory lists, and cotton pads, consistent with trafficking in stolen OTC.

55. On or about December 30, 2015, OUWAD met the CS in Houston, Texas to pay the CS \$1,000 for travel expenses.

56. On or about February 9, 2016, OUWAD met the CS in Houston, Texas to instruct the CS to steal more diabetic test strips. OUWAD also paid the CS \$1,500 for travel expenses.

57. On or about April 12, 2016, OUWAD texted the CS a picture of a receipt showing that \$2,000 had been applied to a Green Dot card for the CS's use while OUWAD believed the CS was traveling out of state to steal OTC.

58. On or about April 28, 2016, under the direction and control of federal law enforcement agents, a controlled shipment of one box of purportedly stolen OTC, valued at approximately \$13,074, was sent from a FedEx store in Pembroke Pines, Florida to Santino Wholesale, 1510 Eldridge Parkway, #110, Houston, Texas. Anti-theft stickers were placed on the OTC, and an inventory list was placed in the box before shipment.

59. On or about April 28, 2016, the CS texted OUWAD the tracking number, and OUWAD acknowledged receipt of the tracking number.

60. On or about September 22, 2016, under the direction and control of federal law enforcement agents, a controlled shipment of one box of purportedly stolen OTC and diabetic test strips, valued at approximately \$12,902, was sent from a FedEx store in Hollywood, Florida to Santino Wholesale, 1510 Eldridge Parkway, #110, Houston, Texas. Anti-theft stickers were placed on the OTC, and an inventory list was placed in the box before shipment.

61. On or about September 22, 2016, the CS texted OUWAD the tracking number, and OUWAD acknowledged receipt of the tracking number.

62. Between November 20, 2015 and August 26, 2016, seven outgoing shipments, containing 26 pallets, were shipped via Old Dominion Freight Lines from GPS Wholesale, 12440 Oxford Park Drive, #B102, in Houston, Texas 77082 to RusselCo, Inc. in Carteret, New Jersey, correlating to the dates the CS sent OUWAD purportedly stolen merchandise.

63. On or about November 22, 2016, OUWAD abandoned a bag of trash left in a rental car returned by OUWAD to Hertz Rent-A-Car, located at 12970 Westheimer Rd., in Houston, Texas. Inventory lists, a cotton pad, and bank documentation were discovered in the bag, consistent with trafficking in stolen OTC.

64. On or about January 20, 2017, OUWAD abandoned a box in a rental car returned by OUWAD to Hertz Rent-A-Car, located at 12970 Westheimer Rd., in Houston, Texas. The box contained numerous toothbrush heads and cotton pads, consistent with trafficking in stolen OTC.

65. On or about May 11, 2017, Luis GARCIA-OYUELA and another unindicted co-conspirator helped the Old Dominion Freight Line (ODFL) driver load two pallets from 12440 Oxford Park Drive, #B102, Houston, Texas 77082 into the ODFL truck. The pallets were sent from GPS Wholesale to RusselCo., Inc. in Carteret, New Jersey.

66. On or about July 20, 2017, Luis GARCIA-OYUELA and other unindicted co-conspirators helped the Old Dominion Freight Line (ODFL) driver load five pallets from 12440 Oxford Park Drive, #B102, Houston, Texas 77082 into the ODFL truck. The pallets were sent from GPS Wholesale to RusselCo., Inc. in Carteret, New Jersey.

67. Between on or about October 13, 2017 and October 17, 2017, ten shipments were sent from Florida to Santino Wholesale, 10878 Westheimer, #108, Houston, Texas 77042 from Luis Perez (or some variation thereof), an alias used by Fabricio JUAREZ to ship stolen OTC.

68. Between on or about October 13 and 14, 2017, Fabricio JUAREZ sent at least two of the shipments from Florida to Santino Wholesale that were discovered at 10878 Westheimer, #108, Houston, Texas 77042.

69. On or about February 3, 2018, OUWAD and GARCIA-OYUELA unloaded boxes from a 2007 Cadillac Escalade into 12440 Oxford Park, #B102.

70. On or about February 9, 2018, agents located price and inventory lists, car rental agreements, and shipping receipts to Santino Wholesale, 10878 Westheimer, #108, Houston, Texas from Hernan Hernandez in HERNANDEZ-MALDONADO's apartment.

71. On or about February 11, 2018, GARCIA-OYUELA exited 12440 Oxford, #B102 with a brown Home Depot box loaded with bags of trash and discarded the box/bags in a dumpster located in a common area parking lot. Upon retrieving the boxes and trash bags, agents found they contained rubber gloves and cotton pads, OTC medications and packaging such as Tylenol, Releev (cold sore medicine), and Refresh Optive (eye drops), and order and inventory price lists of suspected stolen medications, consistent with trafficking in stolen OTC.

72. On or about February 27, 2018, OUWAD and GARCIA-OYUELA possessed approximately \$591,895.76 worth of stolen OTC, such as diabetic test strips, Benadryl, Bayer aspirin, Abreva, Nexium, and Tylenol, which they were storing, cleaning and preparing for shipment at 12440 Oxford Park, #B102, Houston, Texas.

73. On or about February 27, 2018, OUWAD and GARCIA-OYUELA possessed tools and instruments used to "clean" or strip the retail stickers and security labels from the stolen OTC, including a heat gun, hair dryer, lighter fluid, razor blades, cotton pads, and other petroleum based chemicals that are commonly used to remove security labels from stolen merchandise.

74. On or about February 27, 2018, OUWAD and GARCIA-OYUELA possessed Walgreens and CVS security labels that had been removed from stolen OTC.

75. On or about February 27, 2018, OUWAD possessed a set of keys fitting the lock of Life Storage, 12455 Westpark Drive, #E204, Houston, Texas 77082.

76. On or about March 1, 2018, agents searched seven boxes at the Life Storage, 12455 Westpark Drive, #E204, Houston, Texas 77082. Found within the boxes were various kinds of stolen OTC, including Tylenol, razors, toothbrushes, and Bayer aspirin.

77. On or about March 1, 2018, agents searched eight boxes at the Life Storage, 12711 Westheimer Road, #C5, Houston, Texas 77077. The contents of the boxes included handwritten inventory lists of the boxes' contents, on top of several layers of stolen OTC, to include Oral-B toothbrush heads, Gillette Fusion razor blades, and Claritin, Nexium and other medications.

78. On or about March 5, 2018, agents searched three boxes at mailbox #108 located at The Mail Room, 10878 Westheimer Road, Houston, Texas 77042. The boxes were shipped interstate and addressed to Santino Wholesale (or some variation thereof) from Hernan Hernandez. Each of the three boxes contained stolen OTC valued at \$16,577, including handwritten inventory lists.

79. On or about February 26, 2018, HERNANDEZ-MALDONADO and an unindicted co-conspirator stole OTC from a CVS in and around Davenport, Florida.

80. On or about February 26, 2018, HERNANDEZ-MALDONADO shipped the three boxes containing stolen OTC and found in mailbox #108 from a FedEx store in Altamonte Springs, Florida to Houston, Texas.

81. On or about March 5, 2018, agents searched eight boxes at mailbox #123 located at Postal & Packages USA, 12520 Westheimer Road A-1, Houston, Texas 77077. The boxes were shipped interstate from Luis Perz, an alias used by Fabricio JUAREZ, and addressed to Santino Wholesale (or some variation thereof). Each of the eight boxes contained stolen OTC valued at \$29,423, including handwritten inventory lists.

a. On or about February 25, 2018, JUAREZ shipped three boxes containing stolen OTC via FedEx from Fort Myers, Florida to 12520 Westheimer Road A-1, #123, Houston, Texas 77077, where they were subsequently recovered by law enforcement.

b. On or about February 26, 2018, JUAREZ shipped two boxes containing stolen OTC via FedEx from Naples, Florida to 12520 Westheimer Road A-1, #123, Houston, Texas 77077, where they were subsequently recovered by law enforcement.

c. On or about February 26, 2018, JUAREZ shipped three boxes containing stolen OTC via FedEx from Miami, Florida to 12520 Westheimer Road A-1, #123, Houston, Texas 77077, where they were subsequently recovered by law enforcement.

In violation of Title 18, United States Code Section 371.

COUNT TWO THROUGH EIGHT

(INTERSTATE TRANSPORTATION OF STOLEN GOODS, 18 U.S.C. §§ 2314, 21 and 2)

On or about the dates set forth below, in the Southern District of Texas, and elsewhere, the defendants,

**YASSER SALEH OUWAD,
JOLMAN GARCIA-SOTO,
FABRICIO ALEXANDER JUAREZ, and
MARCO HERNANDEZ-MALDONADO,**

aiding and abetting each other, did cause goods, wares, and merchandise with a value of \$5,000 or more to be transported, transmitted, and transferred in interstate commerce, knowing the same to have been stolen, converted, and taken by fraud at the time they crossed state lines and intending to deprive the owner of the use of the property as described in the counts below:

Count	Defendants	Shipment Date	Description of Interstate Shipment
2	YASSER OUWAD	October 30, 2015	Shipment of purportedly stolen over-the-counter merchandise worth \$5,000 or more from Baton Rouge, Louisiana to Texas

3	YASSER OUWAD and JOLMAN GARCIA-SOTO	November 20, 2015	Shipment of purportedly stolen over-the-counter merchandise worth \$5,000 or more from Metairie, Louisiana to Texas
4	YASSER OUWAD and JOLMAN GARCIA-SOTO	December 17, 2015	Shipment of purportedly stolen over-the-counter merchandise worth \$5,000 or more from Hollywood, Florida to Texas
5	YASSER OUWAD	April 28, 2016	Shipment of purportedly stolen over-the-counter merchandise worth \$5,000 or more from Pembroke Pines, Florida to Texas
6	YASSER OUWAD	September 22, 2016	Shipment of purportedly stolen over-the-counter merchandise worth \$5,000 or more from Hollywood, Florida to Texas
7	YASSER OUWAD and FABRICIO JUAREZ	February 25-26, 2018	Shipment of stolen over-the-counter merchandise worth \$5,000 or more from Fort Myers, Naples, and Miami, Florida to Texas
8	YASSER OUWAD and MARCO HERNANDEZ- MALDONADO	February 26, 2018	Shipment of stolen over-the-counter merchandise worth \$5,000 or more from Altamonte Springs, Florida to Texas

All in violation of Title 18 U.S.C. §§ 2314, 21 and 2.

COUNT NINE

(POSSESSION OF STOLEN GOODS, 18 U.S.C. §§ 2315 and 2)

On or about February 27, 2018, in the Southern District of Texas, and elsewhere, the
defendants,

**YASSER SALEH OUWAD and
LUIS GARCIA-OYUELA,**

aiding and abetting each other, did receive, possess, conceal, store, sell and dispose goods, wares, and merchandise with a value of \$5,000 or more, which has crossed a State or United States boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted or taken.

All in violation of Title 18 U.S.C. §§ 2315 and 2.

NOTICE OF FORFEITURE
(18 U.S.C. § 981(a)(1)(C); 28 U.S.C. § 2461(c))

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), the United States gives notice to Defendants

**YASSER SALEH OUWAD (Counts 1-9),
LUIS GARCIA-OYUELA (Counts 1 and 9),
JOLMAN GARCIA-SOTO (Counts 1, 3, 4),
FABRICIO ALEXANDER JUAREZ (Counts 1 and 7), and
MARCO HERNANDEZ-MALDONADO (Counts 1 and 8)**

that in the event of conviction of the any of the offenses charged in Count One through Seven of this Indictment, all property, real or personal, which constitutes or is derived from proceeds traceable to such offense, is subject to forfeiture.

Property Subject to Forfeiture


Defendants are further notified that the property subject to forfeiture includes, but is not limited to over-the-counter medication and health and hygiene products seized from:

- a) GPS Wholesale from 12440 Oxford Park Drive, #B102, in Houston, Texas 77082 on or about February 27, 2018;
- b) Life Storage, 12711 Westheimer Road, #C5, Houston, Texas 77077 on or about March 1, 2018;
- c) Life Storage, 12455 Westpark Drive, #E204, Houston, Texas 77082 on or about March 1, 2018;

- d) The Mail Room, located 10878 Westheimer Rd., #108, Houston, Texas 77042 on or about March 5, 2018; and
- e) Postal & Packages USA, located at 12520 Westheimer Road, #123 and A-1, Houston, Texas 77077 on or about March 5, 2018.

MONEY JUDGMENT AND SUBSTITUTE ASSETS

The United States may seek the imposition of a money judgment against each Defendant. Defendants are notified that in the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the Defendants up to the total value of the property subject to forfeiture.

A TRUE BILL: 

< Original signature on File

 FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK
UNITED STATES ATTORNEY

BY: 

Heather Winter

Assistant United States Attorney

BY: 

Richard Hanes

Assistant United States Attorney